

Jason Crews
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In propria persona

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
PHOENIX DIVISION

Jason Crews,

Plaintiff,

v.

Tanpri Media & Arts, Inc, *et al.*

Defendants.

Case No.: 2:22-cv-02120-SMB

Memorandum in Support of *Plaintiff's Ex Parte*
Application for Subpoenas Duces
Tecum

Pursuant to Federal Rules of Civil Procedure (“FRCP”) Rule 45, 69, and General Order 18-19 (“Order”), Judgment Creditor Jason Crews (“Crews”) respectfully moves the court to instruct the Clerk of the court to issue subpoenas duces tecum to obtain evidence which he believes to be in the possession of third parties for the purposes of judgment enforcement against Judgment Debtors. In support thereof, Plaintiff states as follows.

On March 27, 2024, this court entered a default judgement in Crews’ favor. FRCP Rule 69 states “In aid of the judgment or execution, the judgment creditor or a successor in interest whose interest appears of record may obtain discovery from any person—including the judgment debtor—as provided in these rules or by the procedure of the state where the court is located.”

The Court entered an Order (Doc. 33) rejecting Plaintiff’s prior Application (Doc. 32) because it improperly listed the place of compliance of the subpoenas as Plaintiff’s e-

1 mail address and did not list the addresses of the parties subject to the subpoenas or the
 2 custodians of the documents requested, as the Court's General Order 18-19 requires. In the
 3 present version of the subpoenas, Plaintiff lists his own address in Gilbert, Arizona, as the
 4 place of compliance and still fails to list the addresses of the parties subject to the subpoenas
 5 or their custodians.

6 The Court entered an Order (Doc. 36) rejecting Plaintiff's prior Application (Doc.
 7 35) did not list the addresses of the parties subject to the subpoenas or the custodians of the
 8 documents requested, as the Court's General Order 18-19 requires.

9 Pursuant to General Order 18-19, Judgment Creditor now respectfully moves the
 10 court to instruct the Clerk of the court to issue subpoenas duces tecum to obtain evidence
 11 which he believes to be in the possession of third parties for the purposes of judgment
 12 enforcement against Judgment Debtors.

13 **PayPal**

14 PayPal, Inc ("PayPal") maintains an office at 9999 N 90th St, Scottsdale, AZ 85258,
 15 <https://maps.app.goo.gl/ee8DWi7zsZRHdBoWA>, which is approximately 20.1 miles away
 16 from Crew's address 1515 N Gilbert Rd, Gilbert AZ 8523, and less than 100 miles complaint
 17 with rule 45(c)(2)(A).

18 Per a user search on PayPal.com it appears Judgment Debtor, Matthew Capozzoli
 19 ("Capozzoli") has an account with PayPal and its subsidiary Venmo. As such, Crews, seeks
 20 the following from PayPal:

- 21 1. Please provide the Paypal and Venmo Consumer Profile and Transaction
 22 Search for the following email address "customer token" associated email
 23 addresses:
 24 • mattcapozzoli@gmail.com
- 25 2. To the extent not duplicative of Request No. 1, please provide a list of all
 26 PayPal and Venmo transactions associated with the tokens above from
 27 December 9, 2022 to present.
- 28 3. To the extent not duplicative of Request No. 1, please provide all bank
 account and customer information associated with the Paypal and Venmo
 token account(s) identified, to include, but not limited to, the account holder

name, address, SSN, and linked financial institution, bank account number, and routing number.

Early Warning Systems, LLC

Early Warning Systems, LLC dba Zelle (“Zelle”) maintains an office at 5801 N Pima Rd, Scottsdale, AZ 85250, <https://maps.app.goo.gl/svuswrrFk65x2R1A7>, which is approximately 16.2 miles away from Crew’s address 1515 N Gilbert Rd, Gilbert AZ 85234 and less than 100 miles complaint with rule 45(c)(2)(A).

Matthew Capozzoli

Per a user search on the Zelle payment processing system Capozzoli transacts business with Zelle. As such, Crews seeks the following from Zelle.

1. Please provide the Zelle Consumer Profile and Transaction Search for the following email address “customer token” associated email addresses:

- mattcapozzoli@gmail.com

2. To the extent not duplicative of Request No. 1, please provide a list of all Zelle transactions associated with the tokens above from December 9, 2022 to present.

3. To the extent not duplicative of Request No. 1, please provide all bank account and customer information associated with the Zelle token account(s) identified, to include, but not limited to, the account holder name, address, SSN, and linked financial institution, bank account number, and routing number.

Elizabeth Beauvil

Per a user search on the Zelle payment processing system Elizabeth Beauvil transacts Zelle. As such, Crews seeks the following from Zelle.

1. Please provide the Zelle Consumer Profile and Transaction Search for the following email address “customer token” associated email addresses:

- lizb65@gmail.com

2. To the extent not duplicative of Request No. 1, please provide a list of all Zelle transactions associated with the tokens above from December 9, 2022 to present.

3. To the extent not duplicative of Request No. 1, please provide all bank account and customer information associated with the Zelle token account(s)

1 identified, to include, but not limited to, the account holder name, address, SSN, and
2 linked financial institution, bank account number, and routing number.

3 Dated this May 5, 2024.
4

5 /s/ Jason Crews

6 Jason Crews
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